

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Case No. 2:23-cv-6188 (OEM)(JW)

SUPERB MOTORS, INC., TEAM AUTO SALES LLC.,
ROBERT ANTHONY URRUTIA, 189 SUNRISE
HIGHWAY AUTO LLC., NORTSHORE MOTOR
LEASING, LLC., BRIAN CHABRIER, individually and
derivatively as a member of NORTSHORE MOTOR
LEASING, LLC, JOSHUA AARONSON, individually and
derivatively as a member of 189 SUNRISE HWY AUTO,
LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC,
1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD
AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239
HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD
AUTO LLC, 76 FISK STREET REALTY LLC, 446
ROUTE 23 AUTO LLC, and ISLAND AUTO
MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARA DEO, HARRY THOMASSON,
DWIGHT BLANKENSHIP, MARC MERCKLING,
MICHAEL LAURIE, TOMAS JONES, CPA, CAR BUYERS
NYC INC., GOLD COAST CARS OF SYOSSET LLC,
GOLD COAST CARS OF SUNRISE LLC, GOLD COAST
MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST
MOTORS OF LIC LLC, GOLD COAST MOTORS OF
ROSLYN LLC, GOLD COAST MOTORS OF
SMITHTOWN LLC, UEA PREMIER MOTORS CORP.,
DLA CAPITAL PARTNERS INC., JONES LITTLE & CO.,
CPA'S LLP, FLUSHING BANK, and LIBERTAS FUNDING,
LLC,

Defendants.

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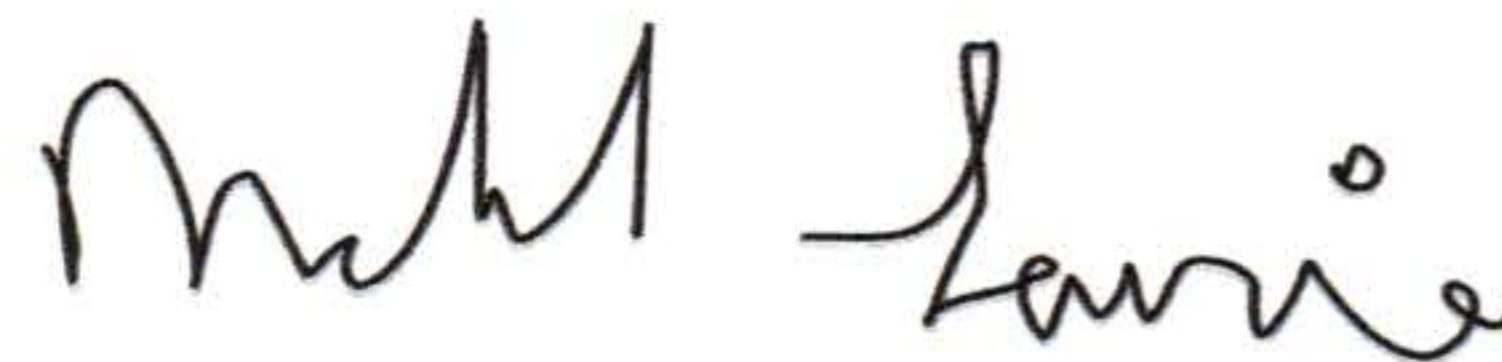
**DECLARATION OF MICHAEL LAURIE IN OPPOSITION
TO PLAINTIFFS' MOTION TO DISQUALIFY**

Michael Laurie, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury that
the following is true and correct:

1. My name is Michael Laurie and I am a Defendant in the above captioned action. As such, I have first-hand knowledge of the facts recited herein.
2. My involvement with the Deos consists merely of helping them to obtain funding from one or more banks, as I am a consultant to and for them in the financial world in which I have worked for years separate and apart from my co-Defendants in this case.
3. I first met Harry Thomasson during the spring of 2023 when I was merely introduced to him when we were both present to meet Anthony Deo at Superb Motors. I was made aware at that time that Harry was the Deos' business attorney.
4. I never had a substantive conversation with Harry until after the instant lawsuit was brought against me in August, 2023.
5. Once this lawsuit commenced, I asked Harry to also represent me herein.
6. I have never conducted any other business for or with Harry Thomasson, and never even had a substantive conversation with him until this lawsuit commenced.
7. I have never committed any wrongdoing towards any of the Plaintiffs; I have never conducted any business for or with any of the Plaintiffs except as follows: 1) I helped NorthShore and/or 189 Sunrise through referrals I made to one or more lending institutions including co-Defendant Libertas; I and all of the co-Defendants firmly believe both NorthShore and 189 Sunrise belong to Anthony and Sara Deo, notwithstanding Plaintiffs' false statements in their Complaint to the contrary; and 2) I traded my car to Superb during or about April, 2023, for which I was compensated on the trade in. However, I have never had a single substantive conversation with any of the Plaintiffs nor conducted any other business with any of the Plaintiffs.

8. I have never conducted any business for or with Marc Merckling or Dwight Blankenship.
9. After speaking with Harry and getting to know him since the night of the Lockout, I am confident in his abilities, training, experience and knowledge, and I only want him to represent my interests in this case.
10. I categorically deny each and every accusation made against me by Plaintiffs, these accusations are bald faced lies for the Plaintiffs own gains and purposes. I also deny each and every accusation made against Harry Thomasson; I would know if he did something wrong in his representation of the Deos, and I am completely unaware of any wrongdoing by Attorney Thomasson.
11. Accordingly, I ask the Court to deny Plaintiffs' application to Disqualify Harry in all respects. They are misusing the Court system, your Honor, by and through the instant lawsuit.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT. EXECUTED ON OCTOBER 30, 2023.



MICHAEL LAURIE